

**REMARKS**

In the Office Action,<sup>1</sup> the Examiner rejected claims 1, 3, 5-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0004874 to Ludwig et al. ("*Ludwig*") in view of U.S. Publication No. 2004/0111302 to Falk et al. ("*Falk*") and U.S. Patent No. 6,578,015 to Haseltine et al. ("*Haseltine*"). Applicants respectfully traverse the rejection, because a *prima facie* case of obviousness has not been established.

"The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious." M.P.E.P. § 2142(III) (8th Ed., Rev. 7, July 2008). "[T]he framework for objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). . . . The factual inquiries . . . are as follows:

(A) [Determining the scope and content of the prior art;]

(B) Ascertaining the differences between the claimed invention and the prior art;  
and

(C) Resolving the level of ordinary skill in the pertinent art."

M.P.E.P. § 2141(II). "Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art." M.P.E.P. § 2141(III).

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Independent claim 1 calls for a combination including, among other things, a “data field [that] has a link to the current state stored in a state value table.”

*Ludwig* discloses, “[t]he system may link the status field to the invoice history page, at which the system may display a full status history for the selected invoice.”

*Ludwig*, para. [0092]. Therefore, *Ludwig* may, at best, disclose a link to a history page storing states, but *Ludwig* fails to disclose a link to a state stored in a history page.

Even the Examiner acknowledges that, in *Ludwig*, “the status field is being linked to the history page,” rather than being linked to a state within the history page. See Office Action at 20. Accordingly, *Ludwig* fails to teach or suggest “the data field has a link to the current state stored in a state value table,” as recited in claim 1. (Emphasis added.)

Regardless of whether the Examiner’s characterizations of *Falk* and *Haseltine* in the Office Action are correct, which they are not, *Falk* and *Haseltine* fail to teach or suggest that “the data field has a link to the current state stored in a state value table,” as recited in claim 1. Therefore, *Falk* and *Haseltine* fail to cure the deficiencies of *Ludwig*.

For at least the foregoing reasons, the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 have not been properly ascertained. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 1.

Furthermore, independent claims 8, 14, and 20, although different in scope from claim 1, are allowable for at least the same reasons as claim 1. Dependent claims 3, 5-7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, and 29 are allowable at least due to their dependence from allowable base claims 1, 8, 14, and 20. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claims 1, 3, 5-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a).

**CONCLUSION**

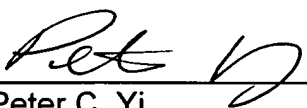
In view of the foregoing, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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